

EXHIBIT 16

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DONNA MOORE, FRENCHOLA HOLDEN
and KEITH MCMILLON individually and on
behalf of all others similarly situated,

Plaintiff,

v.

GMAC MORTGAGE, LLC, GMAC BANK and
CAP RE OF VERMONT, INC.,

Defendants.

Case No.: 2:07-cv-04296-PD

**DECLARATION OF ERIC G. CALHOUN IN SUPPORT OF AN AWARD OF
ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES**

I, Eric G. Calhoun, declare as follows:

1. I am a member in the law firm of Travis & Calhoun, P.C. I submit this declaration in support of Plaintiff's request for an Award of Attorneys' Fees and Reimbursement of Expenses.

2. I am duly admitted to practice law in the State's of Texas, New York, and Illinois, the United States Supreme Court, the United States Courts of Appeal for the Third, Fifth, Sixth, Seventh, Ninth and Federal Circuits, the U.S. District Courts of the Northern, Southern, Western and Eastern Districts of Texas, Southern and Central Districts of Illinois, Middle District of Alabama, Western District of Tennessee, and Western and Northern Districts of New York. I have been practicing since 1989.

3. I regularly practice in the areas of class action, and complex litigation, including class actions involving mortgage lending issues generally and the Real Estate Settlement Procedures Act, specifically.

4. We have been working on this case since prior to its filing in 2007 through the present on a contingent basis and have received no compensation for time expended. Travis & Calhoun, P.C.'s compensation for the services rendered in this case was wholly contingent upon the success of this litigation, and was totally at risk. During the period from the inception of this case through July 24 2014, my firm performed 127.5 hours of work in connection with the litigation. Based upon current hourly rates, the total lodestar value of this time is \$66,912.00. Attached hereto as Exhibit A is a chart, which indicates the attorneys and paralegals who worked on this litigation, their current hourly rates and their respective lodestar values.

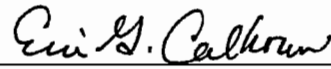
5. The hourly rates utilized by my firm in computing its lodestar are at or below its usual and customary hourly rates charged in complex consumer class actions, commercial and or other complex litigation. No upward adjustment in billing rates was made, notwithstanding the contingency and risk of the matters involved, the opposition encountered, the preclusion of other employment, the delay in payment, or other factors present in the case which would justify a higher rate of compensation.

6. The time and services provided by my firm for which fees are sought in the petition are reflected in the records of my firm. All of the services performed by my firm in connection with this litigation were reasonable and necessary in the prosecution of this case. No time is included in the fee petition for work in connection with the fee and expense application or accompanying documents, including this declaration.

7. The services performed included various litigation tasks, including legal research, fact investigation, strategic decision making, editing briefs, etc.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 28th day of July, 2014.



Eric G. Calhoun
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CO-CLASS COUNSEL FOR PLAINTIFFS

EXHIBIT "A"

Moore v. GMAC

Travis & Calhoun, P.C.

REPORTING PERIOD: Inception – 07/24/2014

Partners	Rate	Hours	Current Lodestar
Eric G. Calhoun	\$650.00	74.1	\$48,165.00
Partner Totals:		74.1	\$48,165.00
Associate			
Richard Pradaritis	\$425.00	39.3	\$16,702.50
Associate Totals:		39.3	\$16,702.50
Project Attorneys			
Investigation			
Investigation Totals:			
Paralegal			
EGC Legal Assistant	\$145.00	14.1	\$2,044.50
Paralegal Totals:		14.1	\$2,044.50
Professional Staff			
Professional Staff Totals:		0.00	\$0.00
Totals:		127.5	\$66,912.00